

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

NANCY RINEHART, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

**AS AMERICA, INC. AND SAFETY TUBS
COMPANY, LLC,**

Defendants.

Case No. 3:16-cv-05128-MAS-LHG

**NOTICE OF MOTION FOR LEAVE
TO APPEAR PRO HAC VICE**

PLEASE TAKE NOTICE that Plaintiff Nancy Rinehart (“Plaintiff” or “Rinehart”) moves pursuant to Local Rule 101.1(c) for an Order admitting Steven L. Woodrow and Patrick H. Peluso of Woodrow & Peluso, LLC as *pro hac vice* counsel for Plaintiff and the alleged class in the above-captioned case.

In support, the Declarations of Mr. Woodrow and Mr. Peluso are attached hereto as Exhibits A and B. A certification from Stefan Coleman is attached hereto as Exhibit C. A proposed order is also attached as Exhibit D.

Respectfully Submitted,

HENNA CARDENAS, individually and on behalf of all
others similarly situated,

Dated October 21, 2016

By: /s/ Stefan Coleman
One of Plaintiff’s Attorneys

Stefan Coleman
Law Offices of Stefan Coleman, LLC
1072 Madison Ave, Suite 1
Lakewood, NJ 08701
law@stefancoleman.com
(877) 333-9427

Steven L. Woodrow*

Patrick H. Peluso*
Woodrow & Peluso, LLC
3900 East Mexico Ave., Suite 300
Denver, Colorado 80210
Tel: (720) 213-0675
Fax: (303) 927-0809
Email: swoodrow@woodrowpeluso.com
ppeluso@woodrowpeluso.com

*Pro Hac Vice application to be filed

Counsel for Plaintiff and the Class

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 21, 2016, I served the above and foregoing papers by causing such paper to be filed with the Court using the Court's electronic filing system, which will send copies of such paper to all counsel of record.

/s/ Stefan Coleman